



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 23, 2017

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2017 ETC Annual Report of Ligonier Telephone Company  
Study Area Code 320783**

Dear Ms. Dortch:

On behalf of Ligonier Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<010> Study Area Code 320783

<015> Study Area Name LIGONIER TEL CO

<020> Program Year 2018

<030> Contact Name: Person USAC should contact  
with questions about this data Randy Mead

<035> Contact Telephone Number: 2608947161 ext.  
Number of the person identified in data line <030>

<039> Contact Email Address: rmead@ligtel.net  
Email of the person identified in data line <030>

Form Type 54.313 and 54.422

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**(200) Service Outage Reporting (Voice)**

## Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 320783

<015>	Study Area Name	LIGONIER TEL CO
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<020> Program Year 2018

<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
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<035> Contact Telephone Number - Number of person identified in data line <030> 2608947161 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> rmead@ligtel.net

<210> For the prior calendar year, were there any reportable voice service outages?

No

[illegible]

<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

<300> Unfulfilled service request (voice)

0
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<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0
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<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 7861
<450>	Complaints per 1000 customers for mobile broadband	

<b>(500) Compliance With Service Quality Standards and Consumer Protection Rules</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
320783in510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	320783in610.pdf

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**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 320783

<015>	Study Area Name	LIGONIER TEL CO
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<020>	Program Year	2018
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<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
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2608947161 ext.

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030> rmead@ligtel.net

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

[illegible]



REDACTED FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
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<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

[illegible]

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<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net
<810>	Reporting Carrier	Ligonier Telephone Co., Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Ligonier Telephone Co., Inc.

[illegible]

FCC Form 481  
OMB Control No. 3060-0986 / OMB Control No. 3060-0819  
July 2013

<900>	Does the filing entity offer tribal land services? (Y/N)	No
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If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

\_\_\_\_\_  
Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

\_\_\_\_\_  
Name of Attached Document

REDACTED FOR PUBLIC INSPECTION

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

320783in1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

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(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)





Name of Attached Document Listing  
Required Information

Name of Attached Document Listing  
Required Information

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



(3005) Rate Of Return Carrier Additional Documentation  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	320783in3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input checked="" type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	320783in3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@lgtel.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

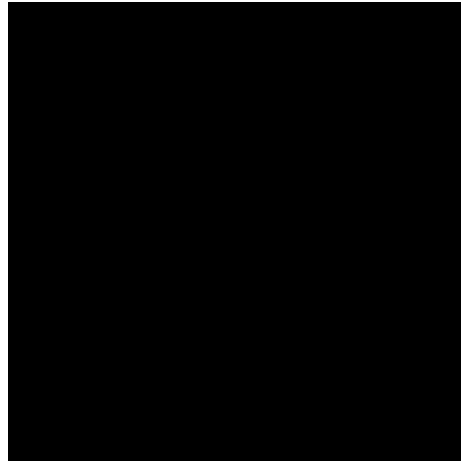
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
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<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320783
<015>	Study Area Name	LIGONIER TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
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<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

# REDACTED FOR PUBLIC INSPECTION

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	320783
<015> Study Area Name	LIGONIER TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Randy Mead
<035> Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>John Staurulakis, Inc.</u>	
Name of Reporting Carrier: <u>LIGONIER TEL CO</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>06/21/2017</u>
Printed name of Authorized Officer: <u>Randy Mead</u>	
Title or position of Authorized Officer: <u>EVP</u>	
Telephone number of Authorized Officer: <u>2608947161 ext.</u>	
Study Area Code of Reporting Carrier: <u>320783</u>	Filing Due Date for this form: <u>07/03/2017</u>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: <u>LIGONIER TEL CO</u>	
Name of Authorized Agent Firm: <u>John Staurulakis, Inc.</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>06/21/2017</u>
Name of Authorized Agent Employee: <u>Alice Lewis</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Manager - Regulatory Affairs</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>2174986863 ext.</u>	
Study Area Code of Reporting Carrier: <u>320783</u>	Filing Due Date for this form: <u>07/03/2017</u>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

## Attachments

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 320783

<015>	Study Area Name	LIGONIER TEL CO
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<020> Program Year 2018

<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
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<035> Contact Telephone Number - Number of person identified in data line <030> 2608947161 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> rmead@ligtel.net

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

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<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<030>	Contact Name - Person USAC should contact regarding this data	Randy Mead
<035>	Contact Telephone Number - Number of person identified in data line <030>	2608947161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rmead@ligtel.net

[illegible]



**Ligonier Telephone Co., Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Ligonier Telephone Co., Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under the Indiana Code (IC) and Indiana Administrative Code (IAC). These obligations include, but are not limited to, the following: (1) adherence to Indiana state consumer protection requirements governing telephone providers which include Quality of Service rules as identified in IC 8-1-17.5-24, and Compliance with Anti-Slamming and Anti-Cramming Procedures as adopted in IC 8-1-29-5, Rule 1.1 170 IAC 7-1.3-8.1; (2) truth-in-billing requirements as required in

<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

Rule 1.3 170 IAC 7-1.3-6; and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**Ligonier Telephone Co., Inc.’s demonstration of ability to function in emergency situations for voice and broadband services:**

Ligonier Telephone Co., Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and Rule 1.2, 170 IAC 7-1.2-18 of the Indiana Administrative Code. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require. In addition, the Company has redundancy for connectivity purposes via additional routes and electronic equipment for both voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. In accordance, and compliance, with Rule 1.2, 170 IAC 7-1.2-18, all switching offices or equivalent with installed emergency power generating equipment have a minimum of three (3) hours battery capacity; switching offices or equivalent without installed

<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

emergency power generating equipment have a minimum battery capacity of five (5) hours.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

The Company complies with the FCC's backup power requirements, effective October 16, 2015.

## **Lifeline Assistance Low-Income Program Terms & Conditions**

Ligonier Telephone Company, Inc. (“Company”) participates in the Lifeline Assistance Program to increase the availability of telecommunications services to all consumers in its serving areas.

**Definition** – The following terms shall be defined as follows:

**Qualifying low-income subscriber** – a subscriber who meets the low-income eligibility criteria established by the Federal Communications Commission (FCC) found in 47 C.F.R. Section 54.409; Medicaid; SNAP; Supplemental Security Income (SSI); federal public housing assistance of Section 8 (a Federal Housing Assistance Program administered by the Department of Urban Development); or Veteran’s or Survivor’s Pension Benefit.

In addition, a consumer may be eligible if his or her household income is at or below 135% of the Federal Poverty Guidelines.

**Toll Blocking** - a service provided by carriers that lets consumers elect not to allow the completion of outgoing toll calls from their telecommunications channel.

**Toll Control** – a service provided by carriers that allows consumers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or billing cycle.

**Toll Limitation** – Denotes both toll blocking and toll control.

The structure of each program is outlined in the following paragraphs.

## **Lifeline Assistance**

### **General**

Lifeline Assistance reduces an eligible customer's monthly residential local telephone service or broadband internet service. Customers will be eligible for a broadband Internet service discount when purchasing a speed package of 10/1 or greater. An eligible customer receives credit for the residential local telephone service or a credit towards the broadband Internet service/bundle.

### **Regulations**

1. Lifeline Assistance is available to all residential customers who meet the following eligibility requirements:
  - a. Customers, their dependent, or their household must be participants in one of the following programs: Medicaid; SNAP; Supplementary Security Income (SSI); federal public housing assistance or Section 8 (a Federal Housing Assistance Program administered by the department of Urban Development); or Veteran's or Survivor's Pension Benefit.
  - b. In addition, a consumer may be eligible if his or her household income is at or below 135% of the Federal Poverty Guidelines.
2. As a participant in Lifeline Assistance, customers are eligible to receive Toll Blocking Service. These services will only be provided at the customer's request. The FUSC (Federal Universal Service Charge) will not apply to customers participating in this program.
3. Local service deposit requirements will be waived for customers who voluntarily receive Toll Blocking Service or Toll Control Service.
4. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, Ligonier Telephone Company, Inc. will not deny re-establishment of local service to customers who are eligible for

Lifeline Assistance and have previously been disconnected for non-payment of toll charges.

5. Partial payments that are received from Lifeline Customers will first be applied to local service charges and then to any outstanding toll charges.
6. The Lifeline discount is effective upon receipt of a completed certification form and proof of eligibility.
7. Only one Lifeline discount is available per household. Lifeline is not transferable.
8. Lifeline customers must recertify their continued eligibility annually. Customers must certify that they continue to be eligible for Lifeline and that no one in their household is receiving the Lifeline discount from another company. Failure to demonstrate continued eligibility will result in the loss the Lifeline discount.

### **Lifeline Credits**

The following credit will apply for each customer eligible for Lifeline Assistance for a one service only:

#### **A Monthly Credit of \$9.25 Will Apply For One Of The Following Services:**

1. Residential Local Telephone Service
2. Broadband Internet Service with Speeds of 10/1 and greater

**Ligonier Telephone Co., Inc. (SAC 320783)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Ligonier Telephone Co., Inc. hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.



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**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**